

**STATEMENT OF BASIS
FOR A NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT
NO. WA-0040711
EXTERIOR WOOD, INC.**

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General Information**Table 1 General information**

Facility Name and Address:	Exterior Wood, Inc. (Exterior) 2685 Index Street Washougal, WA 98671
Type of Facility:	Pressure Wood Preserving
Discharge Location:	Water body name: Columbia River Outfall 001: Latitude: 45° 34' 15" N Longitude: 122° 20' 40" W
Water Body ID Number:	WA-CR-1010
NPDES Permit No. WA-0040711	Issuance Date: May 11, 2004 Effective Date: July 1, 2004 Expiration Date: June 30, 2008

Permit Modification Request

On March 8, 2006, the Department of Ecology (the Department) received a permit modification request (PMR) from Exterior. The Department reviewed the PMR and concluded that it could not be approved at that time.

The PMR asked for the following changes to Exterior's permit:

1. A time extension that would apply to the interim effluent limits for total suspended solids (TSS) and copper; the interim effluent limit for TSS would be lowered to 200 milligrams per liter (mg/L), and
2. Delay of acute toxicity characterization and effluent limits.

On May 15, 2006, the Department responded to the PMR saying that it would reconsider Exterior's PMR when the following items toward meeting final permit requirements/limitations were completed:

1. An engineering report for a stormwater treatment system (STS) was received by August 1, 2006, and approved by the Department, and
2. All documents required by the permit were submitted to the Department on time; that included the biannual acute toxicity compliance monitoring reports (both biannual acute toxicity reports were due by August 1, 2006).

Exterior has met above requirements therefore the Department is moving forward with the permit modification.

The Department recognizes that Exterior needs additional time to build a proposed STS and optimize its operation; therefore the Department proposes to approve the PMR.

The Department Tentative Determination

Exterior is not able to comply with the final copper permit limit of 160 micrograms per liter ($\mu\text{g/L}$) and the TSS permit limit of 50 mg/L at this time, Figure 1 and Figure 2. The compliance won't be possible before the STS is built and optimized.

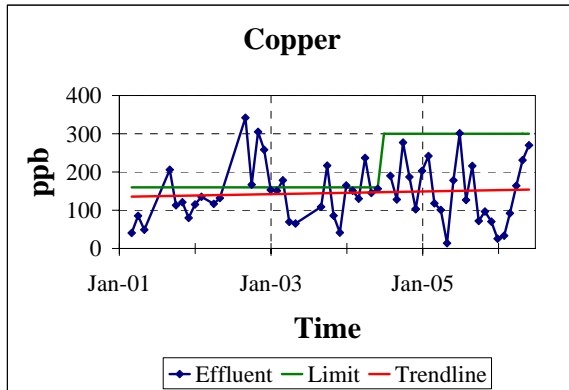


Figure 1 Copper effluent concentration, 2001-2006

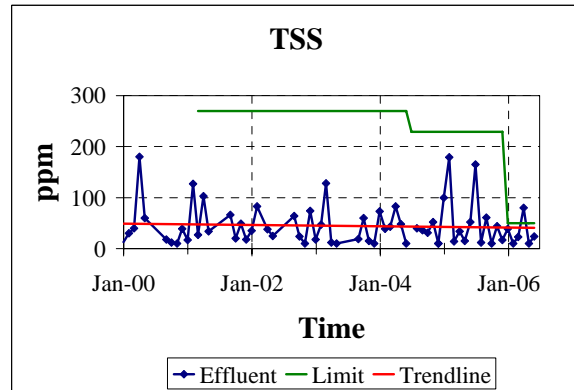


Figure 2 TSS effluent concentration, 2000-2006

Levels of arsenic, chromium and tebuconazole are below the final permit limits.

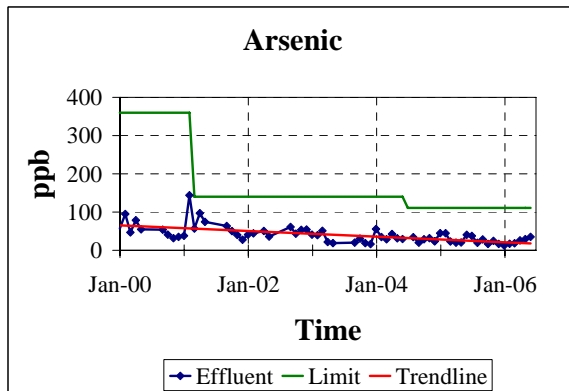


Figure 3 Arsenic effluent concentration, 2000-2006

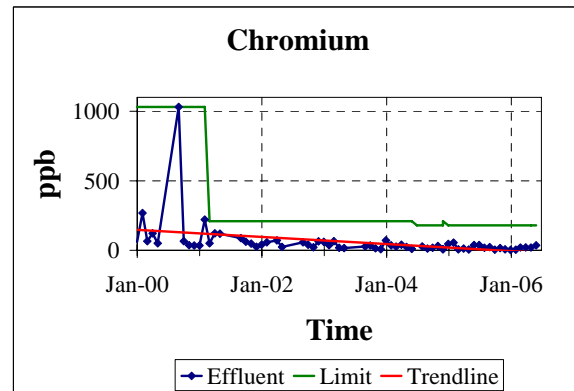


Figure 4 Chromium effluent concentration, 2000-2006

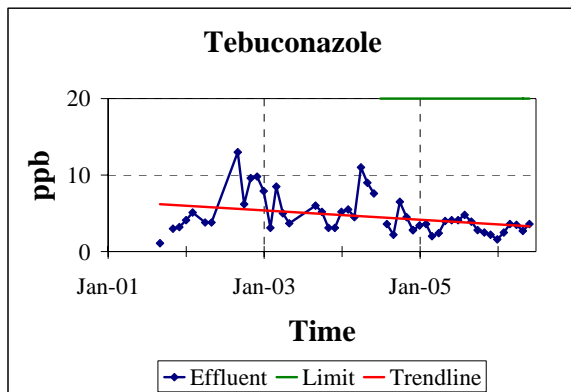


Figure 5 Tebuconazole effluent concentration, 2001- 2006

The Department has tentatively determined, based on the above information, that the requested time extension that would apply to the interim effluent limits for TSS and copper would allow Exterior to build a proposed STS and optimize its operations. The Department proposes to extend the interim copper permit limit of 300 µg/L and setting a lower interim TSS permit limit of 200 mg/L until an expiration day of the permit, June 30, 2008.

The Department has tentatively determined to delay effluent characterization for whole effluent acute toxicity until an expiration day of the permit, June 30, 2008, when Exterior fully implements technology-based controls. Department's tentative determination is in accordance with state regulations, WAC 173-205-030(4):

The department may delay effluent characterization for whole effluent toxicity for existing facilities that are under a compliance schedule in a permit, administrative order, or other legally enforceable mechanism to implement technology-based controls or to achieve compliance with water quality-based effluent limits.

Based on this determination the Special Condition S8—Acute Toxicity is removed from the permit.

Special Condition S12—Stormwater Mixing Study was placed in the permit mainly to insure a correct determination of the acute mixing zone dilution factor (AMZDF) that is need to calculate the acute critical effluent concentration (ACEC). Since the Special Condition S8—Acute Toxicity is being removed from the permit the ACEC is not needed any more as well as the AMZDF to calculate the ACEC. Therefore, the Department proposes to remove the Special Condition S12—Stormwater Mixing Study from the permit. The Department is confident, based on previously done mixing zone modeling, that due to large dilution in the Columbia River, Exterior is already meeting water quality criteria for copper, arsenic and chromium at the edge of mixing zones.

The Department has tentatively determined to place the following compliance schedule into the permit:

- Submittal of Operation and Maintenance (O&M) Manual—by January 30, 2007
- Construction of the STS—by February 28, 2007
- The STS Start-up and Troubleshooting—by May 30, 2007

Public Involvement Information

The Department has tentatively determined to modify the permit to the applicant listed on page 1 of this statement of basis. The Department determination is described in the statement of basis.

The Department will publish a Public Notice of Draft (PNOD) on _____, in the *Camas-Washougal Post* newspaper to inform the public that a draft permit and statement of basis are available for review. Interested persons are invited to submit written comments regarding portions of this draft permit that are modified. The draft permit, statement of basis, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Industrial Unit Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on or request a public hearing on portions of this draft permit that are modified within the 30 day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within 30 days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (360) 407-6280, or by writing to the address listed above.

This permit modification was drafted by Jacek Anuszewski, P.E.